

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

UNITED STATES OF AMERICA,

v.

**VIOLET ANNE GOLDEN, and
STEPHANIE BARNES,**

Defendants.

INDICTMENT

CRIMINAL NO. 2019-

47

VIOLATIONS:

**Title 18, United States Code,
Section 371**

**Title 18, United States Code,
Section 666**

**Title 18, United States Code,
Sections 1343**

**Title 18, United States Code,
Section 1956**

**Title 14, Virgin Islands Code,
Section 791**

**Title 14, Virgin Islands Code,
Section 843**

**Title 14, Virgin Islands Code,
Section 895**

**Title 33, Virgin Islands Code,
Section 1524**

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

1. The Virgin Islands Casino Control Commission ("the Commission") was located in the United States Virgin Islands and was a component of the Government of the Virgin Islands authorized by Title 32, Virgin Islands Code, Section 420, to act in the name of the Government of the Virgin Islands.

2. The Commission was responsible for granting casino licenses and performing other gaming-related regulatory functions in the United States Virgin Islands.

3. **VIOLET ANNE GOLDEN** (“Golden”) was the Chairperson of the Commission and an agent of the Virgin Islands Government. As such, she had a salary of \$105,000 per year.

4. During her time as Chairperson of the Commission, GOLDEN had generated significant outstanding personal debt, in particular with respect to her own personal credit cards.

5. **STEPHANIE BARNES** (“Barnes”) was a contractor of the Commission purportedly performing services related to responsible gaming education. From 2015 to 2018, Barnes received over \$450,000 in Commission funds.

6. H.M. was the son of BARNES, and he was in no way employed or contracted to work on behalf of the Commission.

7. The Virgin Islands was a territory of the United States. In all years relevant to this Indictment, the Government of the Virgin Islands received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.

8. Commission members were allowed to incur only those expenses authorized by the Legislature of the Virgin Islands in the Commission’s annual budget.

9. Commission members were required to comply with procedures and regulations pertaining to travel by employees of the Executive Branch of the Government of the United States Virgin Islands.

10. The Commission was required by Virgin Islands law to file quarterly and annual financial reports, including descriptions of expenses incurred.

11. The Commission maintained multiple bank accounts, including a bank account known as the “Youth Account,” funded by taxes on the revenues of Virgin Islands’ casinos, and

according to Virgin Islands law Youth Account moneys were only to be used for specified youth-related programs.

12. A.R.G. was a separate entity from the Commission and received funds from taxes imposed on the revenues of Virgin Islands casinos. Such funds were to be used for responsible gaming-related activities.

13. D.C. was a casino operating in St. Croix, VI, and as such it was regulated by the Commission. In October 2015, under threat of closure, D.C. paid approximately \$473,000 to the Commission for purported back licensing fees.

COUNT ONE

(Theft from Programs Receiving Federal Government Funds,

18 U.S.C. § 666)

14. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

15. From on or about January 1, 2015 through on or about December 31, 2015, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

VIOLET ANNE GOLDEN

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands

government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

Subparagraph	Date (On or About)	Amount	Nature of Purchase
a)	January – December 2015	\$2,776.10	Dinners at Savant Restaurant, St. Croix, VI
b)	March 3, 2015	\$9,931.27	Las Vegas travel, including first class airfare, for Golden and her family members.
c)	April 4, 2015	\$7,000	Westin St. John resort accommodations
d)	June 24, 2015 – July 4, 2015	\$3,979.57	St. Kitts airfare and hotel for Barnes and H.M.
e)	June 26, 2015	\$110.70	Airfare for L.P., a personal friend of Golden
f)	May 28, 2015 – June 1, 2015	\$3,049.74	Travel for D.T., the son of Golden
g)	July 15, 2015	\$3,974.01	Car repairs for Barnes' personal vehicle
h)	August 13, 2015	\$2,193.55	Centerline car rental for Golden and Barnes

i)	July 16, 2015 – August 12, 2015	\$5,222.41	Car repair for Barnes' personal vehicle
j)	September 3, 2015	\$1,337.47	Hertz Car rental for Barnes and H.M.
k)	September 15, 2015	\$874.10	Flight to Washington, D.C., for Barnes and H.M.
l)	November 23, 2015	\$1,196.91	Repair services for Golden's personal vehicle
m)	November 25, 2015	\$14,624.20	San Juan, Puerto Rico travel for Golden, Barnes, and H.M.
n)	December 22, 2015	\$5,889.03	Airfare for Golden, Barnes, and H.M. for trip to Orlando from 12/30/2015 to 1/12/2016
o)	December 23, 2015	\$2,097.08	AT&T phones and speaker purchases
p)	December 27, 2015	\$1,593	Walt Disney World
q)	December 27, 2015	\$900	Walt Disney World
r)	December 27, 2015	\$1,038.39	Walt Disney World

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT TWO

(Theft from Programs Receiving Federal Government Funds,

18 U.S.C. § 666)

16. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

17. From on or about January 1, 2016 through on or about December 31, 2016, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

VIOLET ANNE GOLDEN

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

Subparagraph	Date (On or About)	Amount	Nature of Purchase
a)	January 1, 2016	\$496.21	Walt Disney World
b)	January 2, 2016	\$396.18	Cirque de Soleil tickets, Lake Buena Vista, FL
c)	January 5, 2016	\$2,478.13	Rosen Hotels, Orlando, FL
d)	January 5, 2016	\$1,612.71	Rosen Hotels, Orlando, FL
e)	January 10, 2016	\$1,931.81	Rosen Hotels, Orlando, FL

f)	January 10, 2016	\$1,005.78	Rosen Hotels, Orlando, FL
g)	January 11, 2016	\$205.24	TJ Maxx purchases
h)	January 11, 2016	\$273.50	TJ Maxx purchases, including ladies' shoes and lingerie
i)	January 11, 2016	\$206.24	TJ Maxx purchases
j)	January 12, 2016	\$3,009.35	Avis rental car purchase for trip to Orlando from 12/30/2015 to 1/12/2016
k)	January 12, 2016	\$335.24	Rosen Hotels, Orlando, FL
l)	January 12, 2016	\$704.29	Rosen Hotels, Orlando, FL
m)	January 25, 2016	\$669.76	Repair services for Golden's personal vehicle
n)	January 25, 2016	\$399.60	Centerline car rental for Golden
o)	March 23 – April 6, 2016	\$19,897.02	Miami trip, including travel advance
p)	April 4, 2016	\$151.76	Neiman Marcus purchase
q)	March 28, 2016	\$918.90	TJ Maxx purchases, including ladies' shoes and lingerie
r)	March 30, 2016	\$636.67	TJ Maxx purchases
s)	May 11, 2016	\$3,041.28	Three business/first class airline tickets for Golden, Barnes, and H.M. for travel to New York

			scheduled for July 9, 2016 to July 19, 2016
t)	May 13, 2016	\$4,935.06	Three tickets for Broadway production of "Hamilton" scheduled for July 11, 2016
u)	May 27, 2016	\$2,440.68	Three airline tickets to St. Kitts for travel beginning June 22, 2016.
v)	June 7, 2016	\$1,050	Crucian Gold purchase
w)	June 26, 2016	\$1,450.65	Tickets to St. Kitts Music Festival
x)	July 1, 2016	\$6,855	Marriott hotel charges for travel to St. Kitts from June 22, 2016 – July 1, 2016.
y)	July 16, 2016 - July 17, 2016	\$535.00	Payment for limo service from Westchester, NY to "Hamilton" production
z)	July 15, 2016 – July 19, 2016	\$10,223.58	Ritz-Carlton Hotel, Westchester, NY
aa)	July 19, 2016	\$1,885.92	Payment for rental Car for New York trip from July 9, 2016 to July 19, 2016

bb)	August 9, 2016	\$3,500	Check to R.C., but cash given to Golden
cc)	September 1, 2016	\$2,802.54	Marriott gift cards
dd)	September – November, 2016	\$13,782.13	Combined purchases for travel to Orlando from October 30, 2016 to November 7, 2016 for Golden, Barnes, and H.M.
ee)	November 2 – November 21, 2016	\$9,200.80	Combined purchases for travel to Orlando from November 13, 2016 to November 18, 2016 for Golden
ff)	October 28, 2016	\$1,125.25	Repair services for Golden's personal vehicle

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT THREE

(Theft from Programs Receiving Federal Government Funds,

18 U.S.C. § 666)

18. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

19. From on or about January 1, 2017 through on or about December 31, 2017, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

VIOLET ANNE GOLDEN

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

Subparagraph	Date (On or About)	Amount	Nature of Purchase
a)	January 22 – February 11, 2017	\$20,243.35	Atlanta and Orlando travel for Golden, Barnes, and H.M., including travel advance
b)	February 7, 2017	\$1,098.82	Nordstrom's clothing purchases
c)	February 7, 2017	\$1,298.82	Nordstrom's purchases
d)	February 8, 2017	\$282.11	Cheesecake Factory purchases
e)	February 16 – May 22, 2017	\$13,885.59	Dallas travel for Golden, Barnes and

			H.M. for May 2017, including travel advance
f)	April 8, 2017	\$350.71	Total Wine and More purchases
g)	April 9, 2017	\$415.62	TJ Maxx purchases
h)	April 9, 2017	\$718.30	Macy's Miami Beach purchases
i)	April 10, 2017	\$483.02	TJ Maxx purchases
j)	April 6 – April 10, 2017	\$11,842.54	Miami travel, including travel advance
k)	April 9, 2017	\$187.35	Cheesecake Factory
l)	April 10, 2017	\$213.90	Cheesecake Factory
m)	April 10, 2017	\$25.80	Cheesecake Factory
n)	April 10, 2017	\$405.00	Cash withdrawal from Commission credit card
o)	May 15, 2017	\$6,411	Jewelry purchases
p)	June 12, 2017	\$1,602	Western Union wire of funds to L.P., a

			personal friend of Golden
q)	June 19, 2017	\$5,600	Private jet flight for trip to St. Kitts for Golden, Barnes, and H.M.
r)	June 16, 2017	\$9,500	Two checks to Golden during St. Kitts trip
s)	June 19, 2017	\$434.64	Kmart purchases of personal items
t)	June 30, 2017	\$1,329.99	iPhone 7 and accessories purchases
u)	July 25, 2017	\$1,364.54	Check to R.C.
v)	December 3, 2017	\$1,000	Western Union wire of funds to V.B., sister of Barnes.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT FOUR

(Theft from Programs Receiving Federal Government Funds, 18 U.S.C. § 666)

20. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

21. From on or about January 1, 2018 through on or about December 31, 2018, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

VIOLET ANNE GOLDEN

being an agent of the Virgin Islands Government, did embezzle, steal, obtain by fraud, without authority knowingly convert to the use of a person not the rightful owner, and intentionally misapply property worth at least \$5,000 owned by, under the care of, and under the custody and control of an organization, government, and agency which received more than \$10,000 in federal program benefits in a one-year period; that is, GOLDEN, an agent of the Virgin Islands government, obtained at least \$5,000 in funds of the Virgin Islands government through the use of Commission credit cards and funds for the personal purchases identified below, among others:

Subparagraph	Date (On or About)	Amount	Nature of Purchase
a)	March 21, 2018	\$699.99	iPhone purchased for V.B., sister of Barnes
b)	March 23, 2018	\$1,026.84	Check to R.C.
c)	June 1, 2018	\$1,400	Check to R.C.

d)	June 8, 2018	\$1,009.29	Avis Car Rental for Golden in Orlando, FL.
e)	June 15, 2018	\$206.99	Western Union wire of funds to V.B., sister of Barnes
f)	July 6, 2018	\$2,000	Check to R.C., but cash went to Golden

All in violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT FIVE

(Conspiracy to Commit Theft from Programs Receiving Government Funds, 18 U.S.C. §§ 371)

22. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

23. Beginning no later than June 1 2015, and continuing through in or about December 31, 2018, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendants,

VIOLET ANNE GOLDEN and STEPHANIE BARNES

and others known and unknown to the Grand Jury, did knowingly and unlawfully conspire to commit an offense against the United States, to wit, to embezzle, steal, obtain by fraud, without authority knowingly convert to their own use, and intentionally misapply, property that was valued at \$5,000 or more and was owned by and under the care, custody and control of an organization,

government, and agency which received more than \$10,000 in federal program benefits in a one-year period, in violation of Title 18, United States Code, Section 666.

Manners and Means of the Conspiracy

24. It was part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did execute a contract whereby **STEPHANIE BARNES** provided problem gaming services, despite the fact that **STEPHANIE BARNES** had no experience or education in problem gaming.

25. It was further part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did use the funds of the Commission for their own personal benefit.

26. It was further part of the conspiracy that **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** would and did create false and falsely-dated invoices for services not actually performed by Barnes.

Overt Acts of the Conspiracy

27. In furtherance of the conspiracy, and to effect the object thereof, **VIOLET ANNE GOLDEN, STEPHANIE BARNES**, and others committed and caused to be committed the following overt acts, among others, within the District of the Virgin Islands and elsewhere:

a. From on or about June 24, 2015 through on or about July 4, 2015, **STEPHANIE BARNES** and H.M. traveled to St. Kitts, paid for with the Commission credit card issued to **VIOLET ANNE GOLDEN**.

b. On or about a date no earlier than June 30, 2015 and no later than December 1, 2015, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** executed a contract requiring the

Commission to reimburse Barnes for travel for “one dependent party” to accompany Barnes on all Commission-related travel.

c. On or about December 27, 2015, **VIOLET ANNE GOLDEN** purchased tickets for Walt Disney World entertainment for herself, **BARNES**, and H.M., using a credit card issued for Commission-related business.

d. From in or around September 2015 to in or around September 2018, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** used funds of the Commission to pay approximately \$44,523 for **BARNES**’ educational expenses.

e. On or about December 30, 2015, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** traveled with H.M. from St. Croix, VI to Orlando, FL in order to, in part, take a personal trip to Walt Disney World, such trip paid for with a credit card issued for Commission-related business.

f. On or about May 13, 2016, **VIOLET ANNE GOLDEN** purchased three tickets for a total of \$4,935 for seats for a Broadway production of “Hamilton,” using a credit card issued for Commission-related business.

g. On or about June 22, 2016, **VIOLET ANNE GOLDEN** and **STEPHANIE BARNES** traveled with H.M. from St. Croix, VI to St. Kitts to attend the St. Kitts Music Festival, travel paid for with a credit card issued for Commission-related business.

h. On or about July 16, 2016, using a credit card issued for Commission-related business, **VIOLET ANNE GOLDEN** paid \$535 dollars for a limousine ride for **VIOLET ANNE GOLDEN**, **STEPHANIE BARNES**, and H.M. from the Ritz-Carlton Hotel in Westchester, NY to a Broadway production of “Hamilton” in New York, NY.

i. On or about July 11, 2016, **VIOLET ANNE GOLDEN, STEPHANIE BARNES,** and H.M. attended a Broadway production of “Hamilton,” the tickets for which were paid with a credit card issued for Commission-related business.

j. Between January 1, 2015 and July 6, 2018, **VIOLET ANNE GOLDEN** caused to be transferred Commission funds to pay down the balances for credit cards that she knew had been used to pay for personal purchases for the benefit of **VIOLET ANNE GOLDEN, STEPHANIE BARNES,** and H.M.

k. Between September 1, 2015 and July 1, 2018, **VIOLET ANNE GOLDEN and STEPHANIE BARNES** caused Commission funds to be paid to **STEPHANIE BARNES** in excess of the amounts due for work performed by Barnes and in the absence of invoices for such work.

l. Between February 24, 2017 and March 1, 2017, **VIOLET ANNE GOLDEN** created false and falsely-dated invoices (“the False Barnes Invoices”) for work supposedly performed by Barnes in 2015-2016, in an attempt to justify the Commission funds paid to **STEPHANIE BARNES.**

m. Between February 24, 2017 and March 1, 2017, **STEPHANIE BARNES** provided the False Barnes Invoices to an auditor with the Virgin Islands Inspector General’s Office.

All in violation of Title 18, United States Code, Section 371.

COUNTS SIX THROUGH NINETEEN

(Wire Fraud, 18 U.S.C. § 1343)

28. The factual allegations contained in Paragraphs 1 through 27 of this Indictment are re-alleged and incorporated as if fully set forth herein.

29. From on or about January 1, 2014 to on or about September 30, 2018, in the District of the Virgin Islands and elsewhere, and within the jurisdiction of this Court, the defendant,

VIOLET ANNE GOLDEN

devised and intended to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, promises, omissions, and concealment of facts.

OBJECT OF THE SCHEME AND ARTIFICE

30. The object of the scheme and artifice to defraud was for GOLDEN to obtain money and property under the custody and control of the Commission, intended to be used for the fulfillment of the Commission's responsibilities, and instead use such money and property for GOLDEN's own personal benefit and the personal benefit of others.

MANNERS AND MEANS OF THE SCHEME AND ARTIFICE

31. It was part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use credit cards issued for official business by the Virgin Islands Casino Control Commission instead for her own personal benefit and the personal benefit of others, as GOLDEN had generated significant personal credit card debt on her own personal credit cards.

32. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use funds of the Virgin Islands Casino Control Commission to pay down the Commission credit card balances incurred for her own personal benefit and the personal benefit of others.

33. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did conceal the credit card statements for credit cards issued by the Virgin Islands Casino Control Commission.

34. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did conceal the bank statements for and control electronic access to the bank accounts used to pay the balances for credit cards issued by the Virgin Islands Casino Control Commission.

35. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did fail to make accurate quarterly financial reports to the Legislature of the Virgin Islands as required Virgin Islands law.

36. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did fail to make accurate annual financial reports to the Virgin Islands Legislature, as required by Virgin Islands law.

37. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use and cause to be used funds paid to the Virgin Islands Casino Commission by D.C. for payment of back licensing fees, to pay down Casino Commission credit cards used for **GOLDEN's** personal benefit and the personal benefit of others.

38. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did withdraw and cause to be withdrawn funds from the Youth Account, knowing that such funds were by law required to be used for youth-related programs.

39. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use and cause to be used funds withdrawn from the Youth Account to pay down Casino Commission credit card balances.

40. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use and cause to be used funds withdrawn from the Youth Account to pay Stephanie Barnes.

41. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did use and cause to be used funds withdrawn from the Youth Account to pay for Casino Commission operating expenses, because the Casino Commission operating account was being used to pay down **GOLDEN**'s Commission-issued credit card balances.

42. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did remove and cause to be removed over \$600,000 in United States currency from the Youth Account for purposes other than those authorized by Virgin Islands law.

43. On or about the dates set forth below, in the District of the Virgin Islands and elsewhere, the defendant,

VIOLET ANNE GOLDEN

for the purpose of executing the scheme and artifice described above, and attempting to do so, caused to be transmitted by means of wire communications in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
Six	November 9, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x1883
Seven	November 20, 2015	EFT payment of \$10,000 from bank account x0484 to

		pay down the Commission credit cards, reference number x9599
Eight	November 20, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x1884
Nine	November 27, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x6512
Ten	November 30, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x3434
Eleven	December 1, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission

		credit cards, reference number x3666
Twelve	December 1, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x0379
Thirteen	December 7, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x3209
Fourteen	December 11, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x5760
Fifteen	December 21, 2015	EFT payment of \$15,000 from bank account x0484 to pay down the Commission credit cards, reference number x6405

Sixteen	December 28, 2015	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x3972
Seventeen	January 5, 2016	EFT payment of \$15,000 from bank account x0484 to pay down the Commission credit cards, reference number x1930
Eighteen	January 13, 2016	EFT payment of \$10,000 from bank account x0484 to pay down the Commission credit cards, reference number x5644
Nineteen	January 18, 2017	Wire transfer of \$5,000 in funds withdrawn from the Youth Account to pay down Commission credit cards.

All in violation of Title 18, United States Code, Section 1343.

COUNT TWENTY

(Wire Fraud, 18 U.S.C. § 1343)

44. The factual allegations contained in Paragraphs 1 through 13 of this Indictment are re-alleged and incorporated as if fully set forth herein.

45. From on or about August 1, 2016 until on or about October 19, 2016, the defendant

VIOLET ANNE GOLDEN

devised and intended to devise a scheme and artifice to defraud A.R.G., and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

OBJECT OF THE SCHEME AND ARTIFICE

46. The object of the scheme and artifice to defraud was for GOLDEN to obtain money and property under the custody and control of A.R.G. by misrepresenting that expenses for reimbursement were incurred for responsible gaming activities, when in fact GOLDEN had incurred such expenses for her own personal benefit and the personal benefit of others.

MANNERS AND MEANS OF THE SCHEME AND ARTIFICE

47. It was part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

would and did reconstitute A.R.G., which until then had been inactive but was nevertheless the owner of a bank account holding funds to be used for responsible gaming-related activities.

48. It was further part of the scheme and artifice that the defendant,

VIOLET ANNE GOLDEN

after reconstituting the A.R.G., would and did request \$152,000 for reimbursement for expenses purportedly incurred for responsible gaming education, when in fact some of the claimed expenses had been incurred for **GOLDEN's** personal benefit, including but not limited to travel to Disney World.

49. On or about October 7, 2016, in the District of the Virgin Islands and elsewhere, the defendant,

VIOLET ANNE GOLDEN

for the purpose of executing the scheme described above, caused to be transmitted by means of wire communications in interstate commerce signals and sounds, to wit: the defendant sent an email to B.M. regarding the defendant's request for reimbursement for expenses purportedly incurred for responsible gaming education.

All in violation of Title 18, United States Code, Section 1343.

COUNT TWENTY-ONE

(Money Laundering, 18 U.S.C. § 1956)

50. On or about March 7, 2016, in the District of the Virgin Islands and elsewhere, the defendants

VIOLET ANNE GOLDEN and STEPHANIE BARNES

aiding and abetting each other, did knowingly conduct and attempt to conduct a financial transaction, to wit, making a down payment for the purchase of a vehicle, which involved the proceeds of a specified unlawful activity, that is, Title 18, United States Code, Section 666, knowing that the transaction was designed in whole or in part to conceal and disguise the nature,

source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT TWENTY-TWO

(Forgery, 14 V.I.C. § 791)

51. Between a date no earlier than June 30, 2015 and no later than December 1, 2015 the defendant

VIOLET ANNE GOLDEN

with the intent to defraud another, did falsely make, alter, and forge a contract, namely, Emergency Retention Agreement, purportedly dated June 30, 2015, when in fact the Emergency Retention Agreement was executed at a later date.

All in violation of Title 14, Virgin Islands Code, Section 791.

COUNT TWENTY-THREE

(Conversion of Government Property, 14 V.I.C. § 895)

52. From on or about January 1, 2014 until on or about December 31, 2018, the defendant

VIOLET ANNE GOLDEN

did embezzle, steal, purloin, and knowingly convert to her own use and the use of another, and without authority convey money and things of value of more than \$1,000 of the Virgin Islands and a department and agency thereof.

In violation of Title 14, Virgin Islands Code, Section 895(a).

COUNT TWENTY-FOUR

(Receipt of Government Property, 14 V.I.C. § 895)

53. From on or about September 1, 2015 until on or about July 1, 2018, the defendant

STEPHANIE BARNES

did receive, conceal, and retain money and things of value of more than \$1,000 of the Virgin Islands and a department and agency thereof, knowing such money and things of value to have been embezzled, stolen, purloined, and converted.

In violation of Title 14, Virgin Islands Code, Section 895(b).

COUNT TWENTY-FIVE

(Fraudulent Claims Upon the Government, 14 V.I.C. § 843)

54. On or about February 24, 2017, the defendant

VIOLET ANNE GOLDEN

did make and use a false bill, receipt, voucher, roll, account, claim, and certificate knowing the same to contain a fraudulent and fictitious statement and entry in a matter within the jurisdiction of an officer, department, board, commission, and other agency of the government of the Virgin

Islands, to wit: **GOLDEN** created false and falsely-dated invoices for work purportedly performed by **STEPHANIE BARNES** on behalf of the Virgin Islands Casino Control Commission.

In violation of Title 14, Virgin Islands Code, Section 843.

COUNT TWENTY-SIX

(Fraudulent Claims Upon the Government, 14 V.I.C. § 843)

55. On or about February 27, 2017, the defendant

STEPHANIE BARNES

did make and use a false bill, receipt, voucher, roll, account, claim, and certificate knowing the same to contain a fraudulent and fictitious statement and entry in a matter within the jurisdiction of an officer, department, board, commission, and other agency of the government of the Virgin Islands, to wit: **BARNES** provided false and falsely-dated invoices for work purportedly performed by **BARNES** on behalf of the Virgin Islands Casino Control Commission.

In violation of Title 14, Virgin Islands Code, Section 843.

COUNT TWENTY-SEVEN

(Failure to File Tax Return, 33 V.I.C. § 1524)

56. During the calendar year 2014, the defendant,

VIOLET ANNE GOLDEN

who was a resident of St. Croix, VI, had and received gross income, including funds stolen and embezzled from the Commission and wages and compensation earned in her employment with the Commission, in excess of the minimum filing requirement and was therefore required under the

income tax law of the Virgin Islands and the regulations issued thereunder to make an income tax return to the Virgin Islands Bureau of Internal Revenue following the close of calendar year 2014 and on or before April 15, 2015. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 15, 2015, in the District of the Virgin Islands and elsewhere, to make an income tax return.

All in violation of Title 33, Virgin Islands Code, Section 1524.

COUNT TWENTY-EIGHT

(Failure to File Tax Return, 33 V.I.C. § 1524)

57. During the calendar year 2015, the defendant,

VIOLET ANNE GOLDEN

who was a resident of St. Croix, VI, had and received gross income, including funds stolen and embezzled from the Commission and wages and compensation earned in her employment with the Commission, in excess of the minimum filing requirement and was therefore required under the income tax law of the Virgin Islands and the regulations issued thereunder to make an income tax return to the Virgin Islands Bureau of Internal Revenue following the close of calendar year 2015 and on or before April 18, 2016. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 18, 2016, in the District of the Virgin Islands and elsewhere, to make an income tax return.

All in violation of Title 33, Virgin Islands Code, Section 1524.

COUNT TWENTY-NINE

(Failure to File Tax Return, 33 V.I.C. § 1524)

58. During the calendar year 2016, the defendant,

VIOLET ANNE GOLDEN

who was a resident of St. Croix, VI, had and received gross income, including funds stolen and embezzled from the Commission and wages and compensation earned in her employment with the Commission, in excess of the minimum filing requirement and was therefore required under the income tax law of the Virgin Islands and the regulations issued thereunder to make an income tax return to the Virgin Islands Bureau of Internal Revenue following the close of calendar year 2016 and on or before April 18, 2017. Well knowing and believing all of the foregoing, she did willfully fail, on or about April 18, 2017, in the District of the Virgin Islands and elsewhere, to make an income tax return.

All in violation of Title 33, Virgin Islands Code, Section 1524.

COUNT THIRTY

(Failure to File Tax Return, 33 V.I.C. § 1524)

59. During the calendar year 2017, the defendant,

VIOLET ANNE GOLDEN

who was a resident of St. Croix, VI, had and received gross income, including funds stolen and embezzled from the Commission and wages and compensation earned in her employment with the Commission, in excess of the minimum filing requirement and was therefore required under the income tax law of the Virgin Islands and the regulations issued thereunder to make an income tax

return to the Virgin Islands Bureau of Internal Revenue following the close of calendar year 2017 and on or before June 29, 2018. Well knowing and believing all of the foregoing, she did willfully fail, on or about June 29, 2018, in the District of the Virgin Islands and elsewhere, to make an income tax return.

All in violation of Title 33, Virgin Islands Code, Section 1524.

FORFEITURE ALLEGATION #1
(Counts 1-5)

1. The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 666 set forth in Counts One through Four of this Indictment, and a conspiracy to violate Section 666, in violation of Title 18, United States Code, Section 371, set forth in Count Five, the defendant,

VIOLET ANNE GOLDEN and STEPHANIE BARNES

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses:

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION #2
(Counts 6-20)

1. The allegations contained in Counts Six through Twenty of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1343 set forth in Counts Six through Twenty, the defendant,

VIOLET ANNE GOLDEN

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

FORFEITURE ALLEGATION #3
(Count 21)

1. The allegations contained in Count Twenty-One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1956 set forth in Count Twenty-One of this Indictment, the defendants,

VIOLET ANNE GOLDEN and STEPHANIE BARNES

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.


3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

GRETCHEN C.F. SHAPPERT

United States Attorney



G. A. Massucco-LaTaif

Chief, Criminal Division



Nathan Brooks

Assistant United States Attorney

United States Attorney's Office, District of the Virgin Islands

5500 Veterans Drive, Suite 260

St. Thomas, Virgin Islands 00802

Telephone (340) 715-9417

Nathan.Brooks@usdoj.gov

DISTRICT COURT OF THE VIRGIN ISLANDS: Returned a True Bill into the District Court 11th day of July 2019, by Grand Jurors and filed.



HONORABLE CURTIS V. GOMEZ

United States District Judge

District of the Virgin Islands

Recd. JURY-07 11:19 PM 04/21